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VIA ECF

May 2, 2025

Chief Judge Renee Marie Bumb
United States District Court, District of New Jersey
Mitchell H. Cohen Building
& U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *SERRANO et al v. CAMPBELL SOUP COMPANY*

Civil Action No. 1:24-cv-04660-RMB-MJS

Dear Judge Bumb:

We represent Plaintiffs Monic Serrano and Debra Shaw in the above-captioned matter. On May 2, 2025, the Court entered a Text Order that the status conference currently set before Magistrate Judge Skahill is converted to an in-person conference before your honor on May 7, 2025; and further ordered that Plaintiffs shall show cause at that time why the Court should not find that they have abused the judicial process, thereby warranting sanctions. (ECF No. 38).

Regarding your Honor's concerns about the proposed First Amended Complaint ("FAC"), it was not Plaintiffs' intention to abuse the judicial process or draw the Court's ire and counsel for plaintiffs sincerely apologizes to the court. While the Plaintiffs' FAC included additional products, it also narrowed the scope of the action from a nationwide class to a California-only class. And, taking guidance from the Court's March 27, 2025 Order dismissing the original Complaint in part, Plaintiffs also removed their claims under the New Jersey Consumer Fraud Act. It was Plaintiffs' sole intention to strengthen the FAC based on guidance in the Court's ruling. Moreover, Plaintiffs' theory of the case essentially remains the same in that Plaintiffs allege that all the products are mislabeled as being naturally flavored and fail to disclose that they contain artificial flavoring. Nevertheless, those facts notwithstanding if the Court will not allow the FAC to be filed, Plaintiffs propose withdrawing the FAC and moving forward with the first filed Complaint that your Honor sustained in part, keeping the original stipulated discovery schedule agreed to by your Honor (ECF Nos. 28 and 31). Essentially,

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putting the case back on track where it was prior to the filing of the First amended Complaint. We are ready to further discuss this matter at the hearing on May 7, 2025.

Plaintiffs thank this Court for its consideration of this letter and hope this alleviates your Honor's concerns.

Respectfully submitted,

/s/ Lee Albert

Lee Albert*

Marc L. Godino

cc: All counsel of record

*Licensed to Practice in
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